

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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In the Matter of the Application of Pacific Gas and Electric Company for Approval of its Electric Vehicle Infrastructure and Education Program (U39E).

Application 15-02-009
(Filed February 9, 2015)

NOTICE OF EX PARTE COMMUNICATIONS

Pursuant to Rule 8.4 of the California Public Utilities Commission (“Commission”) Rules of Practice and Procedure, The Utility Reform Network (“TURN”), Joint Minority Parties, ChargePoint, Inc. (“ChargePoint”), NRG EVgo, TechNet, and Vote Solar provide notice of the following oral and written ex parte communications.

On August 29, 2016, at approximately 11 a.m., Elise Torres, staff attorney with TURN, and Eric Borden, energy analyst with TURN, Tad Gondai, counsel for Joint Minority Parties, Jonah Eidus, REV Program Manager for NRG EVgo, Anne Smart, Director of Government Relations and Regulatory Affairs for ChargePoint and Lynn Haug, counsel for ChargePoint, Jim Baak, Program Director, Grid Integration, for Vote Solar, and Andrew Brown, counsel for TechNet, met at the Commission offices in San Francisco with Matthew Tisdale, energy advisor to Commissioner Florio. The meeting was initiated by request of the above parties. The parties referred to the Guiding Principles/Recommendations endorsed by the non-settling parties in this proceeding and gave Mr. Tisdale a copy, which is attached.

The parties provided a summary update on the current status of the proceeding, and explained that they (along with others not present) represent organizations that have participated actively in the proceeding by sponsoring witnesses and providing testimony responding to PG&E’s original proposal and subsequent revisions, including the current “settlement” proposal. The parties explained that they do not support PG&E’s current proposal and instead collectively support an alternative framework summarized in the Guiding Principles/Recommendations.

Ms. Torres described the relative size and forecast cost of PG&E’s compliant proposal, its enhanced proposal, and the proposal in the contested Settlement Agreement. Ms. Torres stated that the cost of Phase 1 should be limited to the \$87 million forecast budget for the compliant proposal and the cost savings achieved by using dual port chargers should be used to fund work

during any bridge year between Phase 1 and Phase 2. Ms. Torres also recommended that the number of DC fast chargers be limited to ten, due to the high cost and risk associated with DC fast chargers and the investments being made in DC fast chargers by automakers, the California Energy Commission, and pursuant to the NRG settlement. Ms. Torres also emphasized that installation at multi-unit housing was essential for promoting electric vehicle adoption, and should be the primary focus of utility infrastructure investment. Mr. Borden discussed the lack of detailed market and cost-effectiveness analyses in PG&E's application and subsequent filings, as well as the costs of PG&E's proposed settlement in comparison to other utility, market, and public EV charging infrastructure programs.

Mr. Brown explained that TechNet's membership includes site hosts, sellers of EV charging equipment and services, and other tech companies concerned that PG&E's current proposal will create impediments to service and technology innovation, customer choice and pricing options, and the likelihood of stranded cost burdens to ratepayers should the technology PG&E procures become obsolete or underutilized. He conveyed TechNet's preference for the utility to focus on wires infrastructure deployment and potential upgrades, particularly on older distribution circuits.

Ms. Smart explained that ChargePoint and other parties providing EV charging equipment and services oppose PG&E's proposal because it is not tailored to the needs of EV drivers and site hosts in Northern and Central California. She noted that, contrary to PG&E's representations, the tactic of adding some terms from the SDG&E settlement (which ChargePoint supported) does not address fundamental flaws in program design, including requiring EV network service providers to become the "customer of record" at charging station sites, and dictating that all sites pass through TOU rates to drivers. Ms. Smart emphasized that ChargePoint strongly supports programs that enable managed charging and participation in demand response programs, and pointed out that PG&E's proposal defers load management to Phase 2 instead of adopting terms that enable it now.

Mr. Baak expressed concerns that, while PG&E's proposed settlement indicates the utility will nominally coordinate with the Distribution Resources Planning effort on evaluating sites for the charging stations, it does not go far enough to ensure the program complies with the requirements of Public Utilities Code Section 769 in maximizing net benefits of DER for all

customers. The program size, costs, ownership structure, lack of an effective load management tariff/incentive, and inclusion of 100 DC fast charging stations make the proposal unacceptable.

Mr. Eidus noted that in his experience working on many multi-unit residential sites, the primary obstacle is the cost and complexity of upgrading the utility-side electrical service and, to a lesser degree, the customer-side make ready infrastructure – not the cost of the charging station. He recommended that PG&E could do the most good by focusing its attention and resources on expediting make ready installations instead of trying to start a new business enterprise in owning and operating a fleet of DC fast chargers and commercial L2 charging stations. Mr. Eidus also noted that in his experience working on DC fast charger installations, many projects require utility service upgrades or new service drops. The current response time for utility estimates and delivery times for installations have proven to be an impediment to timely installation. Mr. Eidus noted concerns associated with relying on a utility for new or upgraded service while that utility is also a competitor in the space. There is also concern that PG&E DC fast charger locations could be prioritized for new or upgraded service over DC fast charger locations being installed by private EV service providers

Mr. Gondai emphasized that the purported goal of utility involvement in the EV charger market is to help spur adoption of EV. The pilot should therefore focus primarily on the market areas that are currently underserved by charging companies, namely multi-unit dwellings (MUDs). MUDs face much higher barriers to charger installation, yet the population density and necessity of residential charging make MUD sites most likely to positively influence EV adoption. JMP recommended that at least 50% of sites should be allocated at MUDs with a goal of 60%, in keeping with the program goals and Commission precedent.

Ms. Haug noted in summary that the key difference between the PG&E and alternative proposal is that the latter is much simpler and cost-effective in its design, and is a scalable approach that can be easily adjusted as needed in Phase 2.

Dated: September 1, 2016

Respectfully submitted,

By: /s/
Elise Torres

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